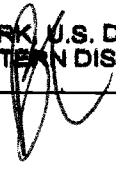


SEALED**FILED**

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 SAN ANTONIO DIVISION

MAR 04 2020

CLERK, U.S. DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 BY  DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

VS.

JONATHAN ANDREW CHAPA (1),

aka "CHOP"

ROGER DIAZ (2),

aka "SLINKS"

JOHN DAVID MEDRANO (3),

XAVIER ZENAS GARZA (4),

JULIAN JIMMY GONZALEZ (5),

aka "JEMS"

TANIA DAHLIA ARTEAGA (6),

aka "TONE"

DEANDRA LEE GARCIA (7),

aka "DEE"

MELODY NANEZ (8), and

ASHLEY LORRAINE RUIZ (9),

Defendants.

CRIMINAL NO.:

Indictment

Ct 1: 21 U.S.C. §§ 846, 841(a)(1), &

841(b)(1)(A)/(B)

Conspiracy to Possess with Intent

to Distribute Heroin and Methamphetamine

Ct 2: 21 U.S.C. §§ 841(a)(1)/(b)(1)(C)

Possession with Intent to Distribute Heroin

Cts 3-4: 21 U.S.C. §§ 841(a)(1)/(b)(1)(B)

Possession with Intent to Distribute

Methamphetamine

SA20 CR0126 XR

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846 & 841(a)(1) & 841(b)(1)(A)/(B)]

Beginning on or about March 25, 2019, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

JONATHAN ANDREW CHAPA aka "CHOP" (1),

ROGER DIAZ aka "SLINKS" (2),

JOHN DAVID MEDRANO (3),

XAVIER ZENAS GARZA (4),

JULIAN JIMMY GONZALEZ aka "JEMS" (5),

TANIA DAHLIA ARTEAGA aka "TONE" (6),

DEANDRA LEE GARCIA aka "DEE", (7),

MELODY NANEZ (8), and

ASHLEY LORRAINE RUIZ (9)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together,

and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved heroin, a Schedule I Controlled Substance, and methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(A)/(B).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
Jonathan Andrew Chapa (1)	100 grams or more of a mixture or substance containing a detectable amount of heroin; 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
Roger Diaz (2)	100 grams or more of a mixture or substance containing a detectable amount of heroin; 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
John David Medrano (3)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
Xavier Zenas Garza (4)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
Julian Jimmy Gonzalez (5)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;

Tania Dahlia Arteaga (6)	100 grams or more of a mixture or substance containing a detectable amount of heroin; 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
Deandra Lee Garcia (7)	100 grams or more of a mixture or substance containing a detectable amount of heroin; 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
Melody Nanez (8)	100 grams or more of a mixture or substance containing a detectable amount of heroin;
Ashley Lorraine Ruiz (9)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

[21 U.S.C. §§ 841(a)(1)/(b)(1)(C) & 18 U.S.C. § 2]

That on or about April 1, 2019, in the Western District of Texas, Defendants,

**TANIA DAHLIA ARTEAGA aka "TONE" (6),
DEANDRA LEE GARCIA aka "DEE" (7), and
MELODY NANEZ (8),**

aided and abetted by each other, did knowingly, intentionally, and unlawfully, possess with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1)/(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

[21 U.S.C. §§ 841(a)(1)/(b)(1)(B)]

That on or about November 12, 2019, in the Western District of Texas, Defendant,

JULIAN JIMMY GONZALEZ aka "JEMS" (5),

did knowingly, intentionally, and unlawfully, possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1)/(b)(1)(B).

COUNT FOUR
[21 U.S.C. §§ 841(a)(1)/(b)(1)(B)]

That on or about December 23, 2019, in the Western District of Texas, Defendants,

**JONATHAN ANDREW CHAPA aka “CHOP” (1), and
ASHLEY LORRAINE RUIZ (9),**

aided and abetted by each other, did knowingly, intentionally, and unlawfully, possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1)/(b)(1)(B).

NOTICE OF UNITED STATES OF AMERICA’S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

This Notice of Demand for Forfeiture includes, but is not limited to, the property listed in Paragraph III below.

I.

Drug Violations and Forfeiture Statutes

**[Title 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), (b)(1)(B) and (b)(1)(C)
subject to forfeiture pursuant to Title 21 U.S.C. §§ 853(a)(1) and (2)]**

As a result of the criminal violations set forth in Count One the United States of America gives notice to defendants of its intent to seek the forfeiture of the property described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and 21 U.S.C. §§ 853(a)(1) and (2), which states:

Title 21 U.S.C. § 853. Criminal forfeitures
(a) Property subject to criminal forfeitures.

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law.--

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; . . .

III.

Properties

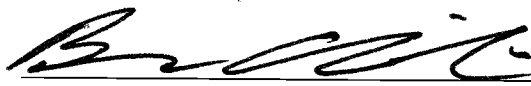
1. XD sub-compact handgun, .40 caliber, serial number XD326933; and
Any related ammunition and firearm accessories

A TRUE BILL


FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:


BRIAN NOWINSKI
Assistant United States Attorney